

Docket No. 23-4509

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

United States of AmericaPlaintiff-Appellee,

v.

Russell Lucius LaffitteDefendant-Appellant.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA,
BEAUFORT DIVISION, RICHARD M. GERGEL, DISTRICT JUDGE

DEFENDANT-APPELLANT’S MOTION FOR EXCESS WORDS

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*Counsel for Defendant-Appellant
Russell Lucius Laffitte*

Defendant Russell Lucius Laffitte (“Laffitte”) respectfully requests that this Court grant him leave to exceed the 5,200-word limit allowed by Federal Rule of Appellate Procedure 27(d)(2)(A) when filing his forthcoming Motion for Release Pending Appeal. Counsel for the Government consents to this Motion.

Good cause exists to exceed the word limit in Rule 27. There are several complicated issues that Laffitte’s Motion for Release Pending Appeal must discuss in detail to present the full series of events and legal arguments to this Court. To do so, the Motion must cite extensively to significant portions of the trial transcripts, affidavits, juror notes, orders, and other material from the record. These materials are lengthy, but are important to reference in the Motion to present a complete picture to this Court regarding the merits of his arguments as to why Laffitte should remain on bond pending appeal.

Laffitte’s counsel intends the Motion for Release Pending Appeal to be no more than 6,900 words, excluding those exemptions enumerated in Rule 32(f). As noted above, counsel for the government consents to the granting of this Motion.

CONCLUSION

This Court should grant Laffitte’s Motion for Excess Words.

Dated: August 14, 2023

Respectfully submitted,

/s/ William W. Wilkins

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CERTIFICATE OF COMPLIANCE

As required by Rule 32(g)(1) of the Federal Rules of Appellate Procedure, I hereby certify that this Defendant-Appellant's Consent Motion for Excess Words is in compliance with the type form and volume requirements. This Motion was prepared using Microsoft Word 2016. It is proportionately spaced; uses a Roman-style, serif typeface (Times New Roman) of 14-point; and contains 191 words exclusive of the material not counted under Rule 32(f) of the Federal Rules of Appellate Procedure.

Dated: August 14, 2023

/s/ William W. Wilkins

William W. Wilkins

Maynard Nexsen PC

Counsel for Defendant-Appellant

Russell Lucius Laffitte

CERTIFICATE OF SERVICE

I certify that on August 14, 2023, the foregoing Motion for Excess Words was served on counsel of record for all parties through the CM/ECF system.

Dated: August 14, 2023

/s/ William W. Wilkins

William W. Wilkins

Counsel for Defendant-Appellant

Russell Lucius Laffitte